



October 4, 2010

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Iowa Smart Planning Task Force
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Smart Planning Task Force Members:

Thank you for your service to the citizens of Iowa. The City of Sioux City has reviewed the Iowa Smart Planning Task Force draft recommendations and would like to express appreciation for the work that has been performed. However, Sioux City, City Council and City staff have several concerns in regard to those recommendations as well as to the public input process.

We greatly appreciate Governor Culver's and the Rebuild Iowa Office's publicly stated commitment to public input and statewide representation. However, we remain concerned over the apparent lack of representation. The letter from the City of Sioux City to the RIO office dated November 5, 2009 expressed concerns regarding lack of input not only from Sioux City but from all of Northwest Iowa. It appears that there still has been no meaningful input from Northwest Iowa on this issue. Considering that the Iowa Smart Planning Bill (SF 2389) contained as primary components: Collaboration, Transparency, and Consistency, the public input process would seem to be an oversight in the preparation of the Iowa Smart Planning Task Force recommendations. We request that additional opportunity be provided to review and to develop recommendations prior to any recommendations being sent to the State Legislature.

We cannot emphasize enough the need for additional opportunities for public input and comments. It appears that notification of the Smart Planning Task Force activities and solicitation of input from all areas of the state impacted by its proposed regulations has been lacking. No one representing the Sioux City was contacted regarding this process, even though the Smart Planning Task Force proposals will have significant impact on the area. In fact, a review of the makeup of the various committees of the Iowa Smart Planning Task Force shows no representation within 200 miles. One representative from Mason City does not adequately represent northwest Iowa.

With regard to the recommendations themselves, the proposed Smart Planning framework appears to give a great deal of authority to develop local comprehensive plans to area COGs. Aside from the fact that a large portion of Iowa is not represented



by a COG, several of the existing COGs represent areas outside the State of Iowa (SIMPCO represents Dakota County, Nebraska and Union County, South Dakota, Bi-State represents Rock Island and Henry Counties in Illinois and MAPA represents Douglas and Sarpy County Nebraska). It appears illogical to have out of state interests helping drive local comprehensive planning efforts. Local comprehensive planning is best done at the local level rather than the regional level.

It appears that the COGs will be unable to prepare comprehensive plans for metropolitan areas without a significant expansion of their authority and budgets. Further, we don't believe that the justification for this recommendation is accurate; we would not agree that COGs have established relationships with major cities when it comes to land use planning. We believe most of Iowa's major Cities have comprehensive plans that were either prepared in-house or by outside consultants; few have plans prepared by COGs for the simple fact that COGs are not normally involved in urban land use planning.

With regard to Recommendation 1.4, we question why the mitigation of flooding is a major emphasis of statewide planning while mitigation of other disasters is not. This is especially perplexing when Recommendation 4 calls for developing a watershed planning and coordination program for each of Iowa's nine major river basins and these nine river basins do not include the Big Sioux River Basin, the Little Sioux River Basin, or the Missouri River Basin.

We also remain concerned about the apparent perspectives of Cities and Counties in the development process. In calling for plans to promote "Transportation Diversity" (Goal 3.2) rural areas of the State seem to have been forgotten; there is no meaningful way to create "transportation diversity" in rural areas. Similarly with calls to limit annexation (Goal 4.1) the committee appears to overlook that considerable urban growth occurs in unincorporated areas with annexation "chasing" development.

Finally there does not appear to be any mechanism to help, or require, abutting jurisdictions to develop consistent plans that do not conflict with each other. Conflicts between abutting entities may be one of the more significant land use issues facing Iowa in the future.

Again, we ask the Task Force to make an effort to seek input from all parts of Iowa, particularly Sioux City and Northwest Iowa. The City of Sioux City is ready and willing to provide its share of resources and staff to this important issue. To that end, Jeff Hanson, Community Development Operations Manager will be contacting you soon in hopes of arranging a one on one meeting. Jeff can be reached at 712-279-6343. We would very much appreciate the opportunity to discuss our concerns.

Sincerely,


Paul Eckert
City Manager

Cc: Jeff Hanson

